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ANNEX

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to the

**COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN
PARLIAMENT AND THE COUNCIL ON THE EUROPEAN ANNUAL ASYLUM
AND MIGRATION REPORT (2025)**

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Second state of play on the implementation of the Pact on Migration and Asylum

INTRODUCTION

The Commission issued the last state of play of the implementation of the Pact on Migration and Asylum in June 2025¹. This second state of play covers the period since then until early October 2025.

In this time, Member States, the Commission and the Union Agencies, together with different stakeholders and partners, continued to work across all building blocks, to ensure that implementation continues.

Further progress has been made, and important milestones have been met, including the development of national strategies and contingency plans, adaptations of national legal frameworks and the adoption of the Implementing Regulation of Regulation (EU) 2024/1351, as well as preparations to deliver on the first Annual Migration Management Cycle.

At the same time, challenges remain, particularly in relation to Eurodac and ensuring that systems are ready on time, regarding the border procedure and the need to implement necessary infrastructure, personnel requirements and administrative arrangements to keep timelines. Furthermore, across the Union, screening arrangements should be finalised and reception capacity aligned with actual needs and the new framework. Finally, arrangements relating to the fundamental rights monitoring as well as for legal counselling should be concluded.

In July 2025, the Commission has presented its proposal for a new Multiannual Financial Framework and has proposed to triple Union financial support for migration, security and border management in the next period, along with a significant increase of funding for the Home Affairs Agencies. In total, the proposed additional Union financial support for the area of home affairs and migration would then amount to EUR 81 billion.

¹ See the first report on the state of play on the implementation of the Pact on Migration and Asylum, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52025DC0319>.

DELIVERING AT UNION LEVEL

A first and essential planning phase started with the presentation of the Common Implementation Plan in June 2024, which provided a framework for the development of the Member States' National Implementation Plans, and the establishment of the relevant governance arrangements².

By now, the work on Pact implementation is fully focused on legislative adaptation, practical operationalisation, and resourcing of the necessary reforms. In this phase, the established coordination mechanisms continue to function well, be it at horizontal level within the framework of the Strategic Committee on Immigration, Frontiers and Asylum (hereinafter: SCIFA) or under the Commission's purpose-built bilateral dialogue with the Member States. More general exchanges with the European Parliament continued in the framework of the regular meetings of the Working Group on Asylum – Implementation of the Pact/Common European Asylum System of the Committee on Civil Liberties, Justice and Home Affairs.

The different legislative proposals put forward by the Commission over the last seven months to complete and complement the Pact are taken forward in the framework of the legislative procedure. This includes the proposal for a new Return Regulation, the proposal relating to the 'safe third country' concept as well as the proposed Union list of safe countries of origin³. The European Parliament has appointed its respective rapporteurs and technical meetings have begun. On its side, the Council has begun work on its positions, with discussions ongoing in the relevant bodies. Meanwhile, work on the implementing acts stemming from the Pact legislation is advancing in the Commission Contact Committees (see by building block in the section below).

The different Union Agencies⁴ have been working closely with the Commission and the Member States, providing support to the reforms according to their mandates. The agencies are generally on track to deliver the different guidance documents, templates and training material that are anticipated in the Common Implementation Plan. In addition, they are providing on-demand support to various Member States and responding to new and emerging challenges. Two EUAA pilot monitoring exercises, in preparation for the full roll-out of the EUAA multiannual monitoring programme (from 2026 onwards), took place with Estonia and the Netherlands. As part of the exercises, two Teams of Experts composed by EUAA, the Commission, and Member States, as well as UNHCR as observers, carried out on-site visits in June 2025. The final reports with the findings have been finalised and shared with the respective Member States. From June 2026 onwards, all Member States will be monitored in terms of their technical and operational implementation of the Pact in a five-year cycle.

The programming of the financial support to Pact implementation started through continuous engagement with the Member States (see section 3.1.). This covers the additional EUR 3 billion

² [Common Implementation Plan for the Pact on Migration and Asylum - European Commission](#).

³ Proposal for a regulation of the European Parliament and of the Council establishing a common system for the return of third-country nationals staying illegally in the Union, and repealing Directive 2008/115/EC of the European Parliament and the Council, Council Directive 2001/40/EC and Council Decision 2004/191/EC, COM(2025) 101 final [EUR-Lex - 52025PC0101 - EN - EUR-Lex](#); Proposal for a regulation of the European Parliament and of the Council amending Regulation (EU) 2024/1348 as regards the establishment of a list of safe countries of origin at Union level COM(2025) 186 final [EUR-Lex - 52025PC0186 - EN - EUR-Lex](#); Proposal for a regulation of the European Parliament and of the Council amending Regulation (EU) 2024/1348 as regards the application of the 'safe third country' concept, COM(2025) 259 final [EUR-Lex - 52025PC0259 - EN - EUR-Lex](#).

⁴ Especially the European Union Asylum Agency, eu-LISA, Frontex, Europol and the Fundamental Rights Agency.

available to Member States to support the implementation of the Pact and hosting displaced persons from Ukraine. Most Member States also qualified to access additional funds available under the mid-term review of the Home Affairs Funds, amounting to a further EUR 1.6 billion.

Parallel support to Member States through the Technical Support Instrument managed by the Commission continues. Currently, the authorities of nine Member States⁵ are receiving tailored support to carry out specific reforms stemming from their National Implementation Plans during the two-year transition period until 2026.

Engagement with civil society took place at Union level in various fora as well as bilateral outreach. A particular element of outreach in the last month included engagement with judiciary networks to foster cooperation and information exchange relating to the procedural changes introduced by the Pact, including related new deadlines for the conclusion of the different procedures⁶. The judiciary's role is particularly important for the functioning of the asylum and return border procedures responsibility rules (Regulation (EU) 2024/1351), detention orders, reception capacities, the appointment of representatives for unaccompanied minors, and legal assistance and representation.

The wider significance of the reforms remains fully in sight: Following the legal deadline of 12 June 2025, 22 Member States finalised their national migration and asylum strategies⁷. These strategies reflect a comprehensive, whole-of-government, strategic approach to migration and asylum. They will in turn inform the first European Strategy on asylum and migration management, due by the end of the year.

OPERATIONALISATION OF THE BUILDING BLOCKS – PROGRESS UPDATE

The number of National Implementation Plans for the Pact remains unchanged since June 2025. At Member State level, coordination and governance arrangements have further evolved, also based on the identification of – and further exchange with – important stakeholders to implement the reforms. This may for example include the need for greater involvement of departments or line ministries responsible for service provision such as education or health, as well as increased engagement with civil society organisations and implementing partners to move forward in the operationalisation of the necessary partnership agreements. Member States who have not done so, should increase engagement, especially with the judiciary, to anticipate related needs.

It will be increasingly important to ensure that remaining national-level milestones and intermediate targets are well-defined and tracked, to help identify and address any delays. This was a more general challenge already identified in the first report on Pact Implementation. Some Member States have established good practices and implementation processes in this regard⁸.

Legislative reforms relating to the alignment of national legal frameworks with the Pact and the transposition of Directive (EU) 2024/1346 are now fully underway. A small number of Member States have already adopted relevant national legislation, either fully or in part⁹. A

⁵ Belgium, Czechia, Estonia, Ireland, Greece, Italy, Lithuania, Romania and Slovakia.

⁶ For example, the Working Group Asylum and Immigration of the Association of European Administrative Judges (AEAJ).

⁷ Croatia, Hungary, Luxemburg and Romania did not yet share their strategies. Romania shared a draft with the Commission pending final adoption, whereas Luxemburg and Croatia notified delays.

⁸ For example, Bulgarian authorities prepared a six-month report for the implementation of the NIP and updated their NIP, which considers the outcome of the Pact funding dialogue with the Commission and the progress made regarding practical implementation.

⁹ This includes Czechia, Greece.

growing number of Member States have either already completed the drafting of legislation or are in the final stages of preparing the proposals¹⁰. In most cases, this process includes different levels of consultation with civil society and key stakeholders¹¹.

Member States who are still reviewing their legislative frameworks should complete this process as soon as possible to ensure drafting is completed and the adoption processes can start early next year¹². Work in the Commission contact committees will develop further guidance and address emerging queries and questions.

Financial support: national programming

Since the last update, the Commission has worked closely with all Member States on the programming of the financial support dedicated to the Pact. The EUR 3 billion allocated for this exercise will help ensure that key elements of the new framework are sufficiently resourced, be it from Union or national funds¹³. All but one Member State¹⁴ submitted forms with their proposals, which are the basis for the dialogue on the financing with the Commission services. This working method allows the Commission to examine the challenges that Member States face and to assist them in deciding on the most appropriate use of the Union funds, complementary to the national budget, in line with the National Implementation Plans.

Key challenges and next steps:

Currently, several Member States have concluded the dialogue on the programming of the additional funds and are on track to finalise the programme amendment process by the end of the year. Most Member States are in the last steps of the dialogue. This process needs to be concluded as soon as possible to move into the amendment stage that may take several months.

Overall, this working method has provided for a very constructive exchange between Member States and Commission services relating to national preparation, complementary to the National Implementation Plans and National Strategies, and established a good practice of regular contacts between Member States and the Commission services on operational matters. These discussions also provide a solid basis for cooperation and joint monitoring of the Pact implementation for the years to come. Continuing a regular dialogue with Member States, including on the progress in budget absorption, will help keep track of challenges and, where appropriate, provide additional tailor-made support, be it operational or financial. Part of the 2026-2027 budget of the AMIF Thematic Facility can be mobilised to further support Member States, based on needs identified during the continued exchange of information on the implementation of the Pact.

¹⁰ Austria, Denmark, Cyprus, Estonia, Lithuania, the Netherlands, Portugal and Spain have finalised or are in the final stages of drafting. Germany submitted a proposal to the Parliament on 12 September. In Bulgaria, Croatia, Finland, France, Ireland, Italy, Malta, Slovakia, Slovenia and Sweden drafting is ongoing. Member States still to conclude the review of legislation for all or parts of the areas covered by the Pact include Belgium, Greece, Romania.

¹¹ Such as in Austria, Bulgaria, Croatia, Cyprus, Denmark, Estonia, Finland, Germany, Ireland, Lithuania, the Netherlands, Portugal, Slovenia, Sweden.

¹² Legislative review underway still in Belgium and Romania, partially outstanding in Greece, possible delays in Latvia and Poland.

¹³ For example, set up border procedures and screening (including where appropriate multi-purpose centres); adequate investment in Eurodac and other IT-related adjustments; ensuring adequate reception capacities, including in accordance with the legal obligations for each Member State's adequate capacity at the external border; and the setup of the national independent and effective Fundamental Rights Monitoring Mechanisms and free legal counselling.

¹⁴ Hungary.

Building Block 1 – Eurodac

Member States continue to work closely with the Commission and eu-LISA to ensure the Eurodac system is operational on time in June 2026. At the most recent meeting of the Eurodac Advisory Group, Member States generally reported good progress: In most Member States, financial allocations have been specified for this objective, be it through national budgets or drawing on Union funds or a combination thereof. In several Member States, providers for relevant services have been selected or procurement procedures accelerated through framework contracts, whereas procurement has started in other Member States¹⁵.

As of September, eight Member States and Europol reported being fully on track¹⁶. 18 Member States reported to still face different challenges, though expect to be able to solve outstanding issues in time¹⁷. One Member State is at risk of not being ready in time¹⁸. Over the past months, eu-LISA has made it possible for Member States to test the operations, with more testing being made available to Member States over the next months.

At Union level, the Commission established the Eurodac regulatory committee and work progressed on the non-legislative acts related to Eurodac, notably on cross-system statistics and to ensure interoperability. The acts are on track to be adopted still this year¹⁹.

Key challenges and next steps:

The implementation of the Eurodac system across the Member States still varies, reflecting different stages of progress. Existing challenges need to be addressed as a matter of urgency, as we are entering the last phase before the entry into application of the Pact. In several cases, challenges include addressing remaining connectivity issues, setting clear targets to complete the testing, launching outstanding procurement procedures, and clarifying modalities related to the nomination of the access point²⁰.

Member States are strongly encouraged to start testing as early as possible, because this allows both eu-LISA and the Member State to identify any issues early on, leaving sufficient time to address them. Five Member States and Switzerland have already initiated testing the actual operation and a good number are about to start over the coming months²¹. However, the majority of Member States have not yet engaged, which in some cases is because they have not yet completed their connectivity test, a prerequisite to test operations²². The Commission and

¹⁵ Belgium, Germany (use of framework contracts), Bulgaria and Croatia (started procurement).

¹⁶ Croatia, Czechia, Estonia, Greece, Netherlands, Romania, Spain, Sweden.

¹⁷ Austria, Belgium, Bulgaria, Cyprus, Denmark, Finland, France, Germany, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Poland, Portugal, Slovakia and Slovenia.

¹⁸ Hungary.

¹⁹ On 24 July the amendments to the following acts were voted and will be adopted soon: C(2021) 6176 & C(2021) 6174 Commission Implementing Decisions laying down the technical rules for creating links between data from different EU information systems pursuant to Article 28(7) of Regulation (EU) 2019/817 and Article 28(7) of Regulation (EU) 2019/818 of the European Parliament and of the Council; and C(2023) 645 & C(2023) 649 Commission Implementing Decisions laying down and developing the universal message format (UMF) standard pursuant to Regulation (EU) 2019/817 & Regulation (EU) 2019/818 of the European Parliament and of the Council. The amendment to the Delegated Decision supplementing Regulation (EC) No 767/2008 of the European Parliament and of the Council, as regards the manual of procedures and rules necessary for queries, verifications and assessments (for short-stay visas, long-stay visas and residence permits), prepared pursuant to Articles 9h and 22b, is delayed.

²⁰ Member States concerned include Austria, Malta, Slovenia, Greece.

²¹ Member States who in September reported to eu-Lisa that they have already initiated testing are France, Ireland, Luxembourg, Romania, Sweden.

²² Belgium, Bulgaria, Cyprus, Denmark, Finland, Hungary, Latvia, Lithuania, Malta, Netherlands, Portugal, Slovenia, Spain.

eu-LISA remain in close technical dialogue with the Member States on this matter and eu-LISA will equally continue to support all Member States where needed.

Building Block 2 – A new system to manage migration at the Union’s external borders

Progress continues towards putting the mandatory asylum and return border procedures in place. Since the June Communication on the Pact implementation state of play, the number of Member States that either already have both the reception facilities and human resources in place to reach adequate capacity or that will do so soon, has further increased²³. Several Member States are setting up and organising for the new mandatory screening, including preparing training schedules²⁴.

Work has continued in the relevant committees, inter alia resulting in the preparation of dedicated Commission guidance on the asylum and return border procedures and regular updates to the guidance on screening, complementing the Practical Handbook for Border Guards. Recent topics addressed in committee meetings also included the use of large-scale IT systems for the purpose of the security and identity checks. Given that the return border procedure relies on the ability to ensure the return of rejected applicants, the 2025 Commission annual assessment under Article 25a of the Visa Code for the first time paid particular attention to countries of origin whose nationals would fall under the border procedure.

In close cooperation, the EUAA and Frontex have developed a harmonised training offer on screening. This preliminary module was made available to users at the end of September. A comprehensive training module on screening will be available from March 2026 onwards. The screening toolbox, developed jointly by Frontex, the EUAA and the Commission with the support of Europol and Member States’ experts is expected by the end of the year. The toolbox complements Commission guidance and comprises a set of user-friendly templates, guidance materials and practical resources²⁵. Operational testing of the toolbox is expected to start in October 2025.

Key challenges and next steps:

Despite progress, several of the challenges identified in the previous report remain. The pending organisational questions include adjusting national legislation, revising or developing standard operating procedures and guidelines, ensuring sufficient staff, undertaking procurement procedures for building or refurbishing facilities, implementing efficient measures to mitigate the risks of absconding, or having to further integrate IT databases²⁶. Where necessary, some temporary bridging measures would be needed²⁷. At this stage, the full

²³ In addition to Belgium, Finland, Luxembourg, Czechia, Cyprus, France, Malta and the Netherlands, who were mentioned in the first state of play on Pact implementation, Austria, Ireland, Portugal, Sweden and Lithuania have either reached the adequate capacity or progress well.

²⁴ Austria, Belgium, Bulgaria, Croatia, Czechia, Cyprus, Estonia, France, Greece, Ireland, Lithuania, Netherlands and Poland and Spain are currently considered well on track to implementing screening.

²⁵ The screening toolbox includes screening form templates and an annex outlining the consultation process for relevant databases; an information provision template based on Art. 11 of Regulation (EU) 2024/1356, a practical annex on conducting preliminary vulnerability checks. It also includes a detailed, step-by-step guiding document on conducting screening, providing practical assistance in using the templates and navigating the screening process as well as a description of training offers by Frontex and EUAA in relation to screening.

²⁶ These include Denmark, Germany, Finland, Italy, Lithuania, Slovenia, Portugal who each face one or multiple of the listed challenges.

²⁷ This may apply to Croatia, Ireland, Estonia, Italy, Latvia and Romania and relate to temporary facilities or arrangements relating to staffing. Greece and Bulgaria will reach the adequate capacity; however, the quality of facilities will need to be ensured.

and timely implementation of adequate capacity remains at risk in some Member States²⁸. Whereas the legal deadline for Member States to notify the locations for the border procedures is 11 April 2026, Member States are invited to indicate the locations as soon as possible to facilitate planning for their set-up.

On screening, a number of Member States still have to define more clearly the distribution of tasks within national structures and harmonise procedures and/or review interoperability requirements. Some Member States already have screening centres, as they already apply arrival processes²⁹. For others, plans to have centralised locations will need to factor in that these may not be fully ready by June 2026. Other Member States opted for a decentralised approach – in particular for screening within the territory. In several cases, arrangements on health checks still need to be defined, including based on cooperation with medical services.

Building Block 3 - Rethinking reception

Many Member States are improving reception capacity, both in quantity and quality. They have taken further steps to address capacity gaps or ensuring that new provisions can be operationalised. This includes the construction of new and the reconstruction and/or upgrade of existing facilities. Many Member States have concretised their plans, with some focusing on the establishment of new multipurpose centres³⁰. The models and blueprints developed by the EUAA and the Commission are useful in this regard, as centres are designed to provide a range of services, from identification and registration to reception facilities for different categories of people as well as access to social workers and legal advice services.

Some Member States are using simulation exercises to assess their reception system's preparedness for the introduction of new procedures/activities by the Pact such as the border procedure and screening³¹.

The possibility to have different reception arrangements based on different types and groups of applicants that is outlined in Directive (EU) 2024/1346 has also been taken up. Member States are introducing or consolidating specific arrangements for the responsibility transfer cases³², but also working to better address the needs of people with vulnerabilities or families in reception centres³³. Several Member States also advanced the case management systems and the digitalisation of processes to enhance access and exchange of data or adapt otherwise to Pact requirements³⁴.

Overall, since the last update in June, Member States and EUAA have made significant efforts to fill gaps in the data collection on reception³⁵. However, national reception systems are very complex and heterogeneous. More granular data is needed from all Member States, for the Commission to provide a more comprehensive and comparable picture of the reception capacity in the Union and in the Member States for the purposes of the annual migration

²⁸ Due to still pending selection of facilities or procurement procedures not yet started, Germany, Latvia, Romania, Slovakia, Slovenia may risk delays.

²⁹ For example: Greece, Italy, Spain, Cyprus.

³⁰ This includes Croatia, Latvia, Lithuania, Luxembourg, Portugal, Romania, Slovakia, Slovenia.

³¹ For example: Ireland, Romania, Sweden.

³² Belgium, Bulgaria, Czechia, Germany, Portugal, Slovakia, Slovenia and Sweden are considering this.

³³ This includes Austria, Cyprus, Czechia, Italy, Lithuania, Portugal, Slovenia.

³⁴ For example, Czechia, Estonia, Italy, Croatia, France, Bulgaria, Portugal, Spain.

³⁵ Based on the available data, it is now possible to have an overview of the number of persons hosted in the formal national reception systems of the Member States, understood as the set of arrangements in place to accommodate asylum applicants as per Directive (EU) 2024/1346. However, current data do not capture the accommodation support provided to beneficiaries of temporary protection outside Directive (EU) 2024/1346, neither is granular enough to compare the reception situation in the different Member States.

management cycle. For the first two annual cycles (2025 and 2026), the Commission and EUAA set forth an incremental approach by which Member States are required to report reception data on core indicators³⁶. As of 2027, Member States will report data to the EUAA on a complete set of reception indicators.

Member States and the Commission services continue to meet in the Reception Contact Committee to prepare the transposition of Directive (EU) 2024/1346 and clarify outstanding issues. Recent discussions addressed issues such as early integration measures, restriction of freedom of movement, detention and alternatives to detention, as well as more generally the interplay with other elements of the Pact. The EUAA Reception Network continues its work to identify operational challenges and share good practices. All these discussions also feed into the upcoming revised EUAA guidance on standards and indicators. The agency's practical guide on setting up and managing an arrival and reception centre is also nearing completion.

Key challenges and next steps:

Some key challenges in national reception systems continue to persist. Any new construction should proceed in a timely fashion and, where necessary, intermediate measures must be put in place to ensure compliance with Directive (EU) 2024/1346 and to guarantee sufficient adequate capacities by the time the Pact enters into operation³⁷. Challenges still exist in relation to vulnerable groups hosted within the reception systems, such as unaccompanied minors and victims of gender-based violence (section 3.10).

Member States that are in the early stages of planning for multipurpose centres and have not done so already should engage with the EUAA to consider the blueprint and models developed specifically to ensure alignment with the provisions and principles of the Pact.

Overall, challenges related to capacity and integration of management systems highlight continuous need for strategic resource allocation. This process is still ongoing for a number of Member States. The Commission continues to pay close attention to cases where Member States plan or are already starting a reduction in their reception capacity to ensure that any such measures are in line with the overall need to have well prepared systems. Member States are also advised to provide detention, in full alignment with the Pact legislation, where detention must be a measure of last resort.

Data reporting and granularity on national reception system need to be further improved to inform the assessment of the reception situation included in the European Annual Asylum and Migration Report³⁸. Given the central role of reception, further work will be required to ensure reception statistics are sufficiently comparable and complete, thus allowing for a more complete assessment.

Building Block 4 - Fair, efficient and convergent asylum procedures

The reforms relating to the Pact legislation continue to be discussed in the relevant fora. EUAA updated the relevant guidance and operational standards and indicators on the asylum

³⁶ Persons in the reception system (total number of persons in the reception system incl. breakdown per legal status of persons in reception and number of UAMs); and capacity of the reception system (total beds available at the end of the reporting period).

³⁷ Concerns relate for instance to Belgium, where courts continue to identify a lack of adequate reception conditions. Other concerns also relate to Bulgaria, Cyprus, Croatia, Latvia, Greece and the Netherlands.

³⁸ More broadly, the organisation of reception systems is different across the Union. Beneficiaries of temporary protection who are provided accommodation support outside this system are not counted in the data reporting of the Member States.

procedures that should be finalised by the end of the year, alongside the practical guide on registration and lodging of applications for international protection.

Various Member States are taking measures to tackle existing backlogs in asylum cases and improve their case management. This ranges from the hiring of additional staff to reforming processes through digitalisation and integrated case-management systems and harmonising workflows and procedures across different stakeholders³⁹. Various Member States make use of the EUAA support e.g. to jointly develop procedures or request deployments or trainings or to direct operational support⁴⁰. The ongoing decrease in asylum requests in the Union will further help Member States to reduce the backlogs in asylum cases.

Most Member States have ensured cooperation with judicial bodies in their implementation work⁴¹. This is crucial to ensure alignment between national judicial practices and Pact provisions, to enable efficient judicial systems to reduce the processing times of applications and expand capacities to process appeals.

As noted above, the legislative procedure for the Commission's proposals relating to the Safe Third Country Concept and to the establishment of a list of Safe Countries of Origin, which will facilitate procedures, is ongoing⁴².

Key challenges and next steps:

Despite the measures taken, further efforts to reduce backlogs and avoid building up new ones are needed⁴³. This may include the timely launch of recruitment procedures, be it for interim or long-term arrangements, and of the trainings necessary to familiarise staff with the new framework, in possible cooperation with the EUAA. Only by reducing their backlogs will Member States be able to limit as much as possible a situation of running two systems in parallel after June 2026 (one based on the then old *acquis* of the Directive 2013/32/EU, and another one based on Regulation (EU) 2024/1348 for cases received after 12 June 2026).

All Member States are encouraged to put further emphasis on the cooperation with the judiciary and address possible risks of overburdened judicial systems and staff shortages, also in view of the shortened deadlines under the new procedures.

As they adjust their systems, Member States also need to continue ensuring effective access to asylum procedures and the application of the principle of non-refoulement.

In line with Communication 2024/570 on countering hybrid threats from the weaponisation of migration and strengthening security at the Union's external borders, measures taken to address such weaponisation of migration at the borders with Belarus and Russia that entail serious

³⁹ Member states currently engaged in these different reforms include Belgium, Cyprus, Finland, Germany, Ireland, Italy and Malta.

⁴⁰ For example, Austria, Belgium, Cyprus, Estonia and Germany, Greece, Italy, Lithuania.

⁴¹ Various Member States put a focus on strengthening the judiciary, including Austria, Czechia, Lithuania, Luxembourg, Finland, Estonia. For example, in Austria, the Federal Administrative Court launched a court-internal project "Ready 4 GEAS".

⁴² On the former, the European Parliament appointed its rapporteur, and a first technical meeting took place on 25 September. The Council has begun the work on its position, with discussions ongoing in the context of the Asylum Working Party. Regarding the proposal for a Union list of Safe Countries of Origin, the discussions are progressing in the Council, with the Danish Presidency advancing on a compromise proposal. The European Parliament has appointed its Rapporteur, and two technical meetings took place in September.

⁴³ Member States who face related challenges include Belgium, Croatia, Estonia, Germany, Greece, Italy, Luxembourg, Netherlands, Poland, Portugal, and Spain. At the same time, in a number of Member States, including Austria, Bulgaria, Croatia, Cyprus, Finland, Germany, Lithuania, Malta, Slovakia and Sweden, pending cases reduced by between 24% to 50% in the period from June 2024-June 2025.

interferences with fundamental rights, such as the right to asylum and related guarantees, have to be temporary, proportional and limited to what is strictly necessary, and ensure that the essence of those rights is respected, while meeting objectives of general interest recognised by the Union.

Building Block 5 - More efficient and fair return procedures

As part of joint efforts to simplify and streamline administrative procedures, alongside with the issuing of negative asylum decisions together with return decisions⁴⁴, Member States are upgrading their national return case management systems and taking steps to make the return process more effective.

Several Member States have made plans to increase their return counselling capacity. Other measures include reinforcing Assisted Voluntary Return Programmes, plans to increase human capacities for the authorities managing return procedures or to establish return offices to facilitate inter-institutional relations and increase the efficiency of return procedures⁴⁵.

Frontex, as requested by Member States, will further strengthen its counselling support, specifically targeting third-country nationals whose appeal against negative asylum decisions has granted them the right to remain on the territory pending a first-instance review⁴⁶. In addition, Frontex is working on a training for return specialists on cooperation with third countries, return IT systems, and on return and reintegration counselling. All Member States continue to actively use the Frontex EU Reintegration programme.

Key challenges and next steps:

The Commission continues to place priority on advancing the negotiations on the proposed Return Regulation⁴⁷, resulting in a swift agreement between the European Parliament and the Council, in any event prior to the application of the Pact in June 2026. The Return Coordinator is working to develop a manual on effective workflows in the Return Border Procedure this year. In parallel, the Commission services, in close cooperation with the Member States, are exploring the possibility of setting up mechanisms to support those Member States that are not yet issuing return decisions at the same time as the negative asylum decisions to develop capacities and procedures to do so.

Frontex will continue to map Member States' IT return case management systems by performing gap analyses and advising on further improvement, as well as seeking to establish interconnections between Frontex' and Member States' national IT return case management systems. More broadly, Frontex is currently evaluating how best to adapt its support to Member States in carrying out forced and voluntary returns within the framework of the Pact. This may entail the establishment of additional return routes, the facilitation of departures from peripheral airports, and the capacity to respond flexibly to short-notice requirements for charter flights. At the request of Member States, Frontex may also deploy Return Escort and Support Officers (FRESO) and return specialist joint mobile teams. The Agency will also expand the geographical coverage of the EU Reintegration Programme.

⁴⁴ As per Art. 37 of Regulation (EU) 2024/1348.

⁴⁵ This includes Austria, Italy, Romania, Slovenia (counselling); Cyprus, Bulgaria and Czechia (AVVR, on return offices: Bulgaria, Sweden.

⁴⁶ See Articles 38 and 68 of Regulation (EU) 2024/1348.

⁴⁷ Proposal for a regulation of the European Parliament and of the Council establishing a common system for the return of third-country nationals staying illegally in the Union, and repealing Directive 2008/115/EC of the European Parliament and the Council, Council Directive 2001/40/EC and Council Decision 2004/191/EC [EUR-Lex - 52025PC0101 - EN - EUR-Lex](#).

Building Block 6 - Making responsibility work

At horizontal level, the new implementing rules for Regulation (EU) 2024/1351 were finalised in July, and their final adoption is planned for October. The rules cover both responsibility rules as well as elements of the solidarity mechanism. They define the modalities of information exchange between Member States as well as the practical details for the effective implementation of the responsibility rules set out in that Regulation (the ‘Dublin rules’) and the solidarity mechanism, effectively delivering on several key milestones across building blocks six and seven of the Common Implementation Plan.

In support of the reforms of the responsibility rules under Regulation (EU) 2024/1351, the EUAA has published two templates for family tracing forms⁴⁸, a Practical Guide on family tracing⁴⁹ and the Guidance on remote interviews in April 2025⁵⁰. The Agency is also working on the revision of the EUAA “Guidance on the Dublin procedure: operational standards and indicators”, planned for 2026.

Member States continue to advance reforms, strengthening their staffing levels, providing training on the new responsibility rules, setting up dedicated facilities, refining procedures for vulnerable groups or families, and upgrading their IT infrastructure⁵¹. Member States are also taking action to reduce possibilities and incentives for unauthorised movements through reforms in their reception system (see section 3.4. above), such as the creation of Dublin centres, and through legislative changes that use the new provisions on the restriction of freedom of movement, but also through greater bilateral cooperation.

Key challenges and next steps:

At the level of Member States, systemic challenges persist, in particular shortages of personnel, the accumulation of backlogs, insufficient reception capacities for incoming transfers, and the absconding of applicants. To safeguard the full implementation of the new system, it is essential to send a clear signal that responsibility rules cannot be circumvented.

Since conditions are in place for transfers to function to and from all Member States, and in view of the applicable rules, these should take place towards all Member States. This is important for the effective transition to the new rules, and for the effective functioning of the annual solidarity cycle.

As underlined in both the European Annual Asylum and Migration Report and the previous Communication on the state of play on the implementation of the Pact, Member States must address any outstanding operational or capacity constraints. This extends to measures concerning other key building blocks, in particular reception conditions and opportunities for early integration. It is also closely linked to the effective implementation of Regulation (EU) 2024/1358.

Based on the new rules, eu-LISA is now developing the technical and operational measures for the communication between Member States via DubliNet. In addition, EUAA will publish the

⁴⁸ [Family Tracing Form – Child](#) | [European Union Agency for Asylum](#) and [Family Tracing Form – Adult](#) | [European Union Agency for Asylum](#).

⁴⁹ Practical Guide on Family Tracing Part 1: [https://euaa.europa.eu/publications/practical-guide-family-tracing-part-i-principles-practices](https://euaa.europa.eu/publications/practical-guide-family-tracing-part-i-principles-practices;); Practical Guide on Family Tracing Part II: <https://euaa.europa.eu/publications/practical-guidefamily-tracing-part-ii-tracing-AMMR>.

⁵⁰ EUAA Guidance on Remote Interviews: <https://euaa.europa.eu/publications/guidance-remote-interviews>.

⁵¹ This includes Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Estonia, Germany, Ireland, Italy, Lithuania, Malta, Portugal.

revision of the *EUAA Guidance on the Dublin procedure: operational standards and indicators*.

Building Block 7 – Making solidarity work

The launch of the first Annual Migration Management Cycle and the establishment of the first Solidarity Pool is a key deliverable of the Pact, intertwined with the responsibility strand of the reforms. The European Annual Asylum and Migration Report, which also includes projection of arrivals, provides the evidence-base for the Commission implementing decision and the Commission Proposal for a Council Implementing act⁵².

Preparatory work for the implementation of the solidarity mechanism continued within the framework of the Solidarity Platform, as did the preparation of the EUAA practical guide on the operational implementation of relocation and responsibility offsets expected for March 2026. The ongoing joint work between the Commission, the Union agencies and Member States within the framework of the Blueprint Network⁵³ led to a satisfactory outcome in the transmission and collection of data for the purpose of the Annual Migration Management Cycle, providing a solid and objective data foundation for the assessment of the migratory situation in the Union.

Key challenges and next steps:

The next steps are defined in the European Annual Asylum and Migration Report. Most importantly, Member States will need to agree on the overall level of solidarity and define their pledges at the High-Level Union Solidarity Forum, in view of finding an agreement on the Solidarity Pool. In parallel, preparations to operationalise the solidarity mechanism are underway within the Commission, notably by working towards setting up of the Technical-level Solidarity Forum, as well as in the Member States.

A common evidence-base and data sharing remain essential for the successful implementation of the Pact. Member States are encouraged to continue working together with the Union Agencies and Eurostat to collect and transmit accurate and timely data, respecting the set deadlines and the commonly agreed definition of the indicators. Streamlining of international protection data is ongoing to ensure a single set of official European statistics on international protection⁵⁴. The improvement of data collection and quality will continue, also through the adoption of Regulation (EU) 2024/1358.

Building Block 8 - Preparedness and contingency planning

Most Member States adopted and notified their national contingency plans on reception and asylum to the EUAA⁵⁵, after common and comparable standards were set in the template provided by the EUAA. In doing so, they met another important milestone set out in the legislation.

Most of the national contingency plans notified to the EUAA reflect the core elements of the template (asylum, reception and unaccompanied minors), albeit with different levels of

⁵² See Articles 9, 11 and 12 of Regulation (EU) 2024/1351.

⁵³ The Blueprint Network, an early deliverable of the Pact, is the operational framework bringing together relevant Union stakeholders to monitor and anticipate migration flows and situations. It was established by Commission Recommendation (EU) 2020/1366 of 23 September 2020 on an EU mechanism for preparedness and management of crises related to migration, [EUR-Lex - 32020H1366 - EN - EUR-Lex](#).

⁵⁴ A joint EUAA-EUROSTAT project is put in place to streamline statistics on international protection.

⁵⁵ Poland and Hungary have yet to notify their contingency plans to EUAA.

completeness and clarity⁵⁶. Most of the plans also included detailed scenarios with clear indicators and thresholds, as well as linkages between the scenarios and response measures. The majority of the plans explain the procedure for the activation/deactivation of the relevant scenarios⁵⁷. The overview of governance arrangements also varied, with some Member States addressing in greater detail how different authorities were involved in formulating the plan and how they will be involved in its activation across different scenario and areas.

Key challenges and next steps:

The Commission and the EUAA are in contact with the Member States on how to strengthen the completeness and clarity of the plans. Some general areas of improvement relate to better identifying well-formulated and measurable indicators for each scenario. Furthermore, the plans should encompass clear response measures per area and scenario. This includes the possible use of EUAA's support. Preparedness measures (e.g. logistics and procurement preparation, stockpiling, training or buffer reception capacity) should be taken to ensure capacities that can be mobilised in a flexible and efficient manner and articulate them in the contingency plan. While almost all Member States indicated linkages with other relevant contingency plans (e.g. borders, returns), not all included these references. Most plans do not explain the process and actors that would be involved to ensure the mandatory revisions foreseen in Directive (EU) 2024/1346.

As indicated by some Member States, ongoing legislative and administrative preparations for the entry into application of the Pact could still affect the content of their contingency plans. The Commission therefore invites the Member States to ensure their plans are updated, if necessary, and notified to the EUAA by the time of entry into application of the Pact. It would also be advisable to ensure capacity building and testing of the plans.

Building Block 9 - New safeguards for applicants for international protection and vulnerable persons, and increased monitoring of fundamental rights

Over the last few months, most Member States have clarified their arrangements relating to legal counselling. In some cases, Member States need to introduce legislative changes, which are currently being drafted⁵⁸. At operational level, whereas several countries are continuing with existing arrangements, most are making changes, by expanding their existing arrangements or establishing new ones. A large majority of Member States plan to work with partners, independent agencies and/or lawyers/legal aid association⁵⁹. Similarly, most Member States have by now identified partners or institutional arrangements to put in place the fundamental rights monitoring mechanism. In most cases, the task will be attributed to existing ombudspersons⁶⁰.

⁵⁶ For example, issues relate to the absence of asylum in the plan (France); absence or lack of clarity of response measures relating to UAMs (Cyprus, Estonia, the Netherlands, Portugal, and Spain), preparedness and response measures (Cyprus), lack of clarity on measures by scenarios (Estonia, Netherlands). Most of these Member States confirmed they intend to revise and complete the plans to better align them to the EUAA's template. Cyprus, Estonia and the Netherlands are already revising their plans, with the support of the EUAA.

⁵⁷ On 30 July 2025, joint indications to notify the Commission and the EUAA on the activation and deactivation of the plan in the cases foreseen in Directive (EU) 2024/1346 were circulated to the Member States.

⁵⁸ This includes Cyprus, Austria, Finland, Spain, Bulgaria, Netherlands, Slovenia, Sweden.

⁵⁹ Such as Austria, Bulgaria, Estonia, Croatia (though building on current system), Czechia, Ireland (legal aid board), Italy, Latvia, Lithuania, Portugal, Romania, Slovakia (expanding current arrangements), Slovenia, Spain, The Netherlands, Germany and Finland are relying on internal arrangements.

⁶⁰ In most cases the task is or will be attributed to existing ombudsperson (Austria, Bulgaria, Cyprus, Czechia, Latvia, Lithuania, Estonia, Poland, Portugal, Romania, Slovakia, though there are exceptions such as Croatia,

Regarding safeguards, the EUAA finalised the information provision materials relating to the new procedures in September 2025 and issued a Practical Guide for free legal counselling in the administrative stage of the procedure⁶¹. For Member States, especially the introduction of screening has required renewed attention and training specifically relating to vulnerability identification and response⁶². As part of this effort, training sessions are being organised. To support early identification and adequate and harmonised responses, the above-mentioned new screening toolbox (section 3.3) also includes a practical annex on conducting preliminary vulnerability checks. In addition, tailor-made training has been made available⁶³. The EUAA is also finalising the revision of the broader training module “Introduction to vulnerability” to reflect the Pact legislation. In relation to returns, Frontex, in collaboration with other stakeholders, is developing a mobile application on working with vulnerable groups, including also a vulnerability check. The Fundamental Rights Agency (hereinafter: FRA) continues to advise Union institutions and national governments on fundamental rights.

Member States also focused on actions related to children that include steps to ensure adequate reception, in some cases changes to age assessment procedures, as well as further engagement relating to guardianship appointments and their supervision⁶⁴.

Key challenges and next steps:

Member States who have not yet defined arrangements related to legal counselling⁶⁵ or the independent fundamental rights mechanism⁶⁶ should do so. All Member States should address any outstanding issues relating to ensuring competence and adequate independence and define clear lines of responsibility and accountability. This implies avoiding splitting this role amongst different actors or, where composite arrangements are chosen, clearly defining a lead role. Building on its December 2024 guidance relating to the set-up of the Mechanism itself, the FRA is currently developing methodological guidance for the work of the future designated monitors.

Challenges must also still be tackled in relation to vulnerable groups hosted within the reception system, such as unaccompanied minors and victims of gender-based violence. Sufficient and adequate reception capacities should be in place for unaccompanied minors who in principle should not be housed together with adults. Member States should increase efforts to ensure timely and adequate representatives for minors throughout all steps of the asylum process and to ensure access to education and health services for children in accordance with the Pact. In federal systems, special attention is needed to align legislation and practice at all levels of government.

the Netherlands. In Romania, the ombudsperson has already formally taken up the task. Ireland proposes the establishment of an independent oversight mechanism through a Chief Inspector for Asylum and Border Procedures, supported by an advisory board.

⁶¹ By the end of the year the information provision materials will be translated in 23 Union languages and 20 non-Union languages.

⁶² Austria for example has launched an initiative to establish vulnerability officers and strengthen cooperation with the UNHCR.

⁶³ “Vulnerability in the Pact on Migration and Asylum”, <https://euaa.europa.eu/publications/euaa-tailor-made-training-plan-pact-migration-and-asylum>.

⁶⁴ Here the Pact contributes to wider reforms: following a period of overcrowding that has highlighted the need to expand and reform the reception system, Ireland’s strong child protection system will be reinforced through Pact implementation.

⁶⁵ Greece, Hungary.

⁶⁶ The latter include, for different reasons: Denmark, Finland, Greece, Hungary, Malta, Slovenia, Spain, Sweden.

The next meeting of the Commission expert group on children in migration will focus primarily on guardianship reforms required by the Pact. In this regard, FRA is working to update the 2014 Handbook on guardianship for unaccompanied children in line with the provisions introduced by the Pact. Still this year, the EUAA will publish an update of the 2018 Guidance on Age Assessment (3rd edition).

Building Block 10 - Integration and legal pathways to protection

Resettlement and legal pathways: The Commission presented its proposal for the first two-year Union Resettlement and Humanitarian Admission Plan (hereinafter: the Union Plan). The proposal for the Union Plan aims to set out the total number of third-country nationals or stateless persons in need of protection that Member States aim to admit in the Union in 2026 and 2027. It reflects the discussion held at the High-Level Resettlement and Humanitarian Admission Committee meetings, the voluntary contributions made by the participating Member States, and the Projected Global Resettlement Needs identified by the UNHCR. The proposed Union Plan identifies the regions from where admission should occur, with the objective of providing viable safe alternatives to irregular journeys and further strengthen the role of resettlement and humanitarian admission in building partnerships with third countries.

The EUAA provides support to Member States with related needs and is finalising the update to its training modules on complementary pathways and on the selection phase in the context of resettlement and humanitarian admission ahead of schedule by the end of 2025.

Integration of beneficiaries of international protection: Most Member States have worked to include Pact provisions related to integration and early integration measures in their national processes of implementation and transposition. As noted in June, the need to invest more or support further integration measures, including by developing early integration measures and a more efficient process for the recognition of qualifications and the validation of skills, was addressed by several Member States in their National Implementation Plans. Some Member States have progressed with national integration strategies⁶⁷ or aim to expand integration efforts with new or earlier integration and language courses⁶⁸.

Key challenges and next steps:

The Council will need to adopt the Union Resettlement and Humanitarian Plan, based on the Commission's proposal, by the end of the year. The Commission stands ready to support Member States in its implementation.

A functioning and coherent integration policy, including early integration measures, remains a prerequisite to support the self-sufficiency of applicants, foster social cohesion and allow beneficiaries of international protection to contribute to the host societies as early on as possible⁶⁹. It also contributes to reducing incentives for unauthorised movements.

Despite their critical importance, integration support measures still vary greatly, and several Member States still need to increase their efforts, particularly regarding support to access to adequate housing, support to labour market integration, recognition of qualifications and setting up early integration measures⁷⁰. To increase the effectiveness of their support, Member States should make further efforts to provide adapted measures to specific needs and remove

⁶⁷ Malta launched the Integration Strategy and Action Plan (2025-2030) in January 2025.

⁶⁸ For example, Austria, Czechia, Estonia, Italy, Luxemburg, Slovenia.

⁶⁹ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Action plan on Integration and Inclusion 2021-2027, COM(2020) 758 final, [EUR-Lex - 52020DC0758 - EN - EUR-Lex](#).

⁷⁰ Such as Bulgaria, Croatia, Cyprus, Greece, Hungary, Latvia, Slovakia, Romania.

obstacles for target groups such as migrant women, children or persons with mental health related needs, as highlighted in the mid-term review of the Action plan on integration and inclusion.

The Commission continues to support Member States' integration policies by providing funding (including for long-term integration under Union cohesion funds), developing guidance and fostering multi-level partnerships involving migrants, host communities, local and regional authorities, social and economic partners, civil society and the private sector.

CONCLUSION

Over the next eight months, sustained progress is needed to ensure the successful entry into application of the Pact reforms, providing a stable foundation for future Union action for migration and asylum management. This requires effort now and it will require collective work in the future.

Focus should be on the challenges outlined in this report, ensuring that solidarity and responsibility systems function, Eurodac systems are ready, arrangements for the border procedure are in place, and adequate reception capacities are ensured across all Member States. Further important elements of the Pact are the fundamental rights monitoring, legal counselling and new safeguards provisions for vulnerable groups.

The Commission remains fully engaged on this path and will continue its work both at horizontal and bilateral level through the work of the dedicated country teams.

With the launch of the Annual Migration Management Cycle, progress must be made in addressing existing weaknesses in the Dublin system and to prepare in full the application of the responsibility framework of Regulation (EU) 2024/1351. In parallel, work will advance to implement the Solidarity Pool.

At Union level, an important deliverable will be the adoption of a European Asylum and Migration Management Strategy in December 2025. This Strategy will build on the national strategies that Member States transmitted to the Commission in June, covering both the internal and external dimensions of migration in a comprehensive and integrated approach.

The Commission will present the next state of play on the implementation of the Pact to the European Parliament and the Council in March 2026.